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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF UBER'S  
STATEMENT IN RESPONSE TO  
PLAINTIFF'S ADMINISTRATIVE MOTION  
TO CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED [SUMMARY JUDGMENT  
OPPOSITION MATERIALS]**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at Kirkland & Ellis LLP, counsel of record for Defendants Uber  
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer this  
4 Declaration in the above-captioned matter in support of Uber’s Statement in Response to Plaintiff’s  
5 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed [Summary  
6 Judgment Opposition Materials].

7 2. Plaintiff takes no position as to Uber’s proposed redactions.

8 3. Attached as Exhibit A is a true and correct copy of Plaintiff’s Opposition to Defendants’  
9 Motion for Partial Summary Judgment with Uber’s proposed redactions.

10 4. Attached as Exhibit B is a true and correct copy of Exhibit 5 to Plaintiff’s Opposition to  
11 Defendants’ Motion for Partial Summary Judgment with Uber’s proposed redactions.

12 5. Attached as Exhibit C is a true and correct copy of Exhibit 12 to Plaintiff’s Opposition to  
13 Defendants’ Motion for Partial Summary Judgment with Uber’s proposed redactions.

14 6. Attached as Exhibit D is a true and correct copy of Exhibit 14 to Plaintiff’s Opposition to  
15 Defendants’ Motion for Partial Summary Judgment with Uber’s proposed redactions.

16 7. Attached as Exhibit E is a true and correct copy of Exhibit 17 to Plaintiff’s Opposition to  
17 Defendants’ Motion for Partial Summary Judgment with Uber’s proposed redactions.

18 8. Attached as Exhibit F is a true and correct copy of Exhibit 19 to Plaintiff’s Opposition to  
19 Defendants’ Motion for Partial Summary Judgment with Uber’s proposed redactions.

20 9. Attached as Exhibit G is a true and correct copy of Exhibit 23 to Plaintiff’s Opposition to  
21 Defendants’ Motion for Partial Summary Judgment with Uber’s proposed redactions.

22 10. Attached as Exhibit H is a true and correct copy of Exhibit 24 to Plaintiff’s Opposition to  
23 Defendants’ Motion for Partial Summary Judgment with Uber’s proposed redactions.

24 11. Attached as Exhibit I is a true and correct copy of Exhibit 28 to Plaintiff’s Opposition to  
25 Defendants’ Motion for Partial Summary Judgment with Uber’s proposed redactions.

26 12. Attached as Exhibit J is a true and correct copy of Exhibit 30 to Plaintiff’s Opposition to  
27 Defendants’ Motion for Partial Summary Judgment which is sealed in full.  
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1           13. Attached as Exhibit K is a true and correct copy of Exhibit 31 to Plaintiff's Opposition to  
2 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

3           14. Attached as Exhibit L is a true and correct copy of Exhibit 32 to Plaintiff's Opposition to  
4 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

5           15. Attached as Exhibit M is a true and correct copy of Exhibit 33 to Plaintiff's Opposition to  
6 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

7           16. Attached as Exhibit N is a true and correct copy of Exhibit 42 to Plaintiff's Opposition to  
8 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

9           17. Attached as Exhibit O is a true and correct copy of Exhibit 43 to Plaintiff's Opposition to  
10 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

11           18. Attached as Exhibit P is a true and correct copy of Exhibit 44 to Plaintiff's Opposition to  
12 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

13           19. Attached as Exhibit Q is a true and correct copy of Exhibit 45 to Plaintiff's Opposition to  
14 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

15           20. Attached as Exhibit R is a true and correct copy of Exhibit 52 to Plaintiff's Opposition to  
16 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

17           21. Attached as Exhibit S is a true and correct copy of Exhibit 53 to Plaintiff's Opposition to  
18 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

19           22. Attached as Exhibit T is a true and correct copy of Exhibit 54 to Plaintiff's Opposition to  
20 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

21           23. Attached as Exhibit U is a true and correct copy of Exhibit 55 to Plaintiff's Opposition to  
22 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

23           24. Attached as Exhibit V is a true and correct copy of Exhibit 56 to Plaintiff's Opposition to  
24 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

25           25. Attached as Exhibit W is a true and correct copy of Exhibit 57 to Plaintiff's Opposition to  
26 Defendants' Motion for Partial Summary Judgment with Uber's proposed redactions.

1 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
2 is true and correct.

3 Dated: December 30, 2025

4 /s/ Laura Vartain Horn  
5 Laura Vartain Horn  
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